

LEVIN-EPSTEIN & ASSOCIATES, P.C.

420 Lexington Ave. • Suite 2525 • New York, NY 10170
T: 212.792-0048 • F: 212.561.7108
E: Jason@levinepstein.com

January 20, 2020

Via Electronic Filing

The Honorable Magistrate Judge Steven M. Gold
U.S. District Court Eastern District of New York
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singh v. Lintech Electric, Inc. et al*
Case No.: 1:18-cv-05780-FB-SMGJO

Dear Honorable Magistrate Judge Gold:

This law firm represents Defendants Lintech Electric, Inc., Linden J. Tudor, Holly Tudor and Tudor Enterprise Family Limited Partnership (collectively, the “**Defendants**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rule 1(A), this letter respectfully serves to advise the Court that on Friday, January 17, 2020 at 2:12 p.m., counsel for Plaintiff communicated to the undersigned via email that he “will not be filing a request for remand.”

The undersigned reminded Plaintiff’s counsel that he was directed by Your Honor to formally withdraw his promotion conference application. *See* Dckt. No. 40. As of the date of this letter, Plaintiff’s counsel failed to respond to the undersigned’s reminder and has not withdrawn his application.

Out of an abundance of caution, this letter respectfully requests that Your Honor formally withdraw Plaintiff’s counsel’s promotion conference application.

This letter also respectfully proposes the following briefing schedule for Defendants’ anticipated Motion to dismiss the two state court actions captioned *Singh v. Holly Tudor* (Index No. 720551-2019), which was removed to this Court on December 16, 2019 [*see* Dckt. No. 32], and *Singh v. Tudor Entr. Family Ltd Partnership et al* (Index No.: 526826-2019), which was removed to this Court on January 15, 2020 [*see* Dckt. No. 39]:

Defendants’ Memoranda of Law in Support of the Motion to be submitted on or before February 17, 2020;

Plaintiff’s Memoranda of Law in Opposition to the Motion (if any) to be submitted within two (2) weeks of the date Defendants’ Motion to Dismiss is filed; and

Defendants’ Reply Memoranda of Law in Further Support of the Motion to be submitted within two (2) weeks of the date Plaintiff’s Opposition (if any) is filed.

Accordingly, Defendants respectfully request that Your Honor: (i) formally withdraw Plaintiff's counsel's promotion conference application; and (ii) adopt the proposed briefing schedule for Defendants' anticipated Motion to Dismiss.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi

420 Lexington Ave., Suite 2525

New York, NY 10170

Tel.: (212) 792-0048

Email: Jason@levinepstein.com

Attorneys for Defendants

To: All Counsel of Record (via ECF)